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7 *Attorneys for the Federal Defendants*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 Nadav Biderman,

11 Plaintiff,

12 v.

13 Alejandro Mayorkas, United States  
14 Secretary of Homeland Security; Ur  
Mendoza Jaddou, Director of U.S.  
Citizenship and Immigration Services; Terri  
Robinson, Director of National Benefits  
Center of USCIS; Lola K. Parocua, Las  
Vegas Field Office Director of USCIS; and  
John Doe, Adjudication Office for Las Vegas  
Field Office of USCIS,

15 Defendants.

16 Case No. 2:24-cv-01095-JCM-MDC

17 **Stipulation and Order to Stay  
Proceedings (First Request)**

18 Pursuant to Local Rule IA 6-1 and Local Rule 7-1(c), Plaintiff and Defendants,  
through their undersigned counsel, jointly request a stay in this matter for a period of 90 days.  
The requested stay would move the due date for Defendants' answer from August 20, 2024,  
to November 18, 2024. This is the parties' first stipulation to stay this case.

23 The parties conferred and they believe they will be able to resolve this matter without  
24 continued litigation. Plaintiff's Complaint (ECF No. 1) seeks as relief that the Court compel  
25 Defendants to perform their duties in connection with adjudicating Plaintiff's I-130 Petition  
26 for Alien Relative and I-485 Application for Adjustment of Status. Since the Complaint's  
27 filing, Defendants scheduled for August 27, 2024, an interview in connection with Plaintiff's  
28 I-485 Application, and Defendants issued a corresponding interview notice. Although

1 Defendants scheduled an interview, the parties need additional time to conclude the  
2 administrative process.

3 A stay in this case will allow the parties to resolve this matter without continued  
4 litigation. This request is not sought for purposes of delay or any other improper purpose, but  
5 to facilitate the parties' efforts to resolve the matter in a "just, speedy, and inexpensive"  
6 manner consistent with Fed. R. Civ. P. 1.

7 The parties reserve the ability to seek additional time to finalize resolution, if  
8 necessary, but anticipate they will be able to file dismissal paperwork prior to the identified  
9 deadline.

Respectfully submitted this 20th day of August 2024.

LAW OFFICE OF ANTHONY  
D. GUENTHER, ESQ.

JASON M. FRIERSON  
United States Attorney

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*/s/ Christian R. Ruiz*  
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## **IT IS SO ORDERED:**

**UNITED STATES DISTRICT JUDGE**

**DATED:** \_\_\_\_\_ August 22, 2024